


The request to file
under seal and to file
a public redacted
version is granted

MADUEGBUNA COOPER LLP

SO ORDERED


11/15/2022

ATTORNEYS AT LAW
30 WALL STREET
8TH FLOOR
NEW YORK, NEW YORK 10005
(212) 232-0155
FAX: (212) 232-0156
www.mcande.com

November 14, 2022

VIA ELECTRONIC FILING (ECF)

The Honorable Loretta A. Preska
United States District Judge
500 Pearl Street
New York, NY 10007

Re: *Amy Miller v. Levi & Korsinsky, LLP, et al.*
Docket No.: 20-cv-01390(LAP)(BCM)

Dear Judge Preska:

We represent Plaintiff Amy Miller in the above-referenced matter brought against Defendants Levi & Korsinsky, LLP, Eduard Korsinsky and Joseph Levi (collectively, “Defendants”) and write pursuant to Your Honor’s Individual Practices Rule 4(A).

We request an order allowing Plaintiff to seal all non-publicly available exhibits in support of her opposition to Defendants’ motion for summary judgment, including Defendants’ discovery and Plaintiff’s electronically stored information (“ESI”). All of these documents, which are voluminous, have been marked confidential during discovery, thereby necessitating sealing.

On September 23, 2022, the defendants likewise filed their own letter motion to seal their exhibits and, where necessary, redact information, which was granted on September 26 (Dkt. # 100). Defendants’ discovery contains highly confidential information, including attorney work product, communications, negotiations and profit and loss and salary numbers. Plaintiff’s discovery also contains sensitive attorney work product and communications, as well as personal ESI concerning private matters like her children, parents, appointments, and unrelated goings-on that have nothing to do with this action.

In addition, as with Defendants’ submissions, portions of the memorandum of law in opposition and the Rule 56.1 response and counter-statement will need to be partially sealed to protect the information listed above. However, Plaintiff reserves her right to unseal these filings after conferring with counsel or upon a motion.

As such, and in keeping with the granting of Defendants’ letter motion to seal and redact

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where necessary, Plaintiff respectfully requests permission to file under seal non-publicly available exhibits in opposition to Defendants' summary judgment motion.

We thank the Court in advance for its consideration of this request.

Respectfully Submitted,

/s/ Samuel O. Maduegbuna

Samuel O. Maduegbuna

cc: All attorneys of record (*via* ECF)